

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

UNITED STATES OF AMERICA,	)	CASE NO. 1:20CR392
	)	
Plaintiff,	)	JUDGE SOLOMON OLIVER, JR.
	)	
vs.	)	
	)	<b><u>UNOPPOSED JOINT MOTION TO</u></b>
CHARLES VACCARO,	)	<b><u>CONTINUE HEARING ON MOTIONS</u></b>
	)	<b><u>TO WITHDRAW AS COUNSEL</u></b>
Defendant.	)	

Now comes undersigned counsel, Paul M. Flannery, Christos N. Georgalis, and Alex B. Spiro, and respectfully requests a two-week continuance, until March 3, 2021, on tomorrow's hearing regarding counsel's motions to withdraw for the reasons outlined herein.

On December 14, 2020 and December 15, 2020, undersigned counsel filed their motions to withdraw as counsel for Defendant Charles Vaccaro. The Court scheduled a hearing on counsels' motions to occur on January 28, 2021. On January 27th, undersigned counsel requested a ten (10) day continuance on the hearing as Mr. Vaccaro and his new counsel were diligently working to secure and finalize the terms of their engagement—which would render moot any issues with undersigned counsel's pending motions to withdraw. The Court granted the motion on January 28<sup>th</sup> and reset the hearing for February 10, 2021.

Due to certain unforeseen administrative delays involved in the transferring of client IOLTA funds to Mr. Vaccaro's new counsel, the finalization of his engagement required additional time. Undersigned counsel requested an additional seven days for new counsel to complete the engagement. The Court reset the hearing for February 17, 2021.

Undersigned counsel has been advised that, since the last continuance, new lead counsel has received the transfer of IOLTA funds and has been formally retained. New lead counsel, an out of state attorney, has been in contact with the new local counsel and expects the process engaging new local counsel to be complete by the end of next week.

Therefore, in the interest of judicial economy, and to preserve defense resources, undersigned counsel respectfully requests that tomorrow's hearing be postponed for two (2) weeks in anticipation that Mr. Vaccaro's new counsel's entry into the matter will render the upcoming hearing moot.

Neither party will be prejudiced by this delay as no trial date has been set and discovery is still ongoing. Undersigned counsel has communicated with Assistant U.S. Attorney Alex Abreu, counsel for the Government, and the United States does not oppose this motion.

Respectfully submitted,

/s/ Paul M. Flannery

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 16, 2021, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. A copy of this motion was sent to Mr. Vaccaro via electronic mail. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/s/ Paul M. Flannery

Paul M. Flannery

*Attorney for Defendant Charles Vaccaro*